

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Margaret H. Brennan	:	Chapter 13
		:	
	Debtor	:	
JP Morgan Chase Bank, NA	:		
Movant	:		Bankruptcy Case Number
	:		09-15807 BIF
	:		

**Debtor's Response to the Motion for
Relief from the Automatic Stay**

Debtor, **Margaret H. Brennan**, by and through her counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to Movant's Motion and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant
5. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, it appears that Movant inappropriately paid for back real estate taxes that are already scheduled to be paid

through Debtor's Chapter 13 Plan and then attempted to recoup those taxes by increasing Debtor's monthly payment.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, it appears that Movant inappropriately paid for back real estate taxes that are already scheduled to be paid through Debtor's Chapter 13 Plan and then attempted to recoup those taxes by increasing Debtor's monthly payment.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtor, **Margaret Brennan**, requests that this Honorable Court deny the motion of Movant for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

/s/ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor